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J. Napor - by Mr. Sieminski

Q. Did you in any way, and when I say you I mean you, Jack Napor, and to your knowledge anyone at WRS, advise Mr. Herklotz that the Services Agreement was going to be entered into?

MR. REILLY: One reservation before you answer that question. That presupposes that they had a duty to do that or that advising somebody else on behalf of Herklotz is tantamount to advising him. The question as I understand it is did he personally or anybody else personally talk to Mr. Herklotz.

MR. SIEMINSKI: I understand your objection because it was set forth in interrogatory answers, so I follow that and that is on the record. You qualified it in a personal way that I don't necessarily want the question to be limited to.

MR. REILLY: Did Jack or anybody else at WRS talk to Mr. Herklotz?

MR. SIEMINSKI: Right.

BY MR. SIEMINSKI:

Q. Let me try to put it in plain

EXHIBIT 12

J. Napor - by Mr. Sieminski

Q. To anybody. I just want to understand why there would be a reference to Dovenet on this document.

A. I don't know. Where do you see Dovenet?

Q. Under the column Batch I.D.

A. I'm on a different page than you are.

Q. The first sheet after Answer to Interrogatory No. 1.

A. I don't know why it is on there, but Dovenet is the new software. MCBA is the old software, so it may have been prepared partially from each different system, the two systems.

Q. Does this document reflect invoice amounts? Is that what it purports to represent? Purchase order amounts, what are the figures that are reflected here?

A. These are sales invoice amounts.

Q. In the Amount Remaining column, is that intended to be a running total?

A. I believe that column is the outstanding amount on each invoice.

J. Napor - by Mr. Sieminski

Q. If we would look to the dates of the invoices, let me phrase it this way, if we were trying to understand the dates of the invoices themselves would we look to the document date that is in the left-hand column?

A. I believe that's the case, yes.

Q. If I was trying to understand invoices that were generated after the date for instance of the Services Agreement I would identify the date of the Services Agreement and then all of the invoices after that date would have been generated by WRS after the date of the Services Agreement; is that fair?

A. I think that's correct.

Q. If you page through then to the Answer to Interrogatory No. 16, it is the next set of documents --

A. Okay.

Q. -- that's in reference to a question or set of questions about the lock box account. In response to a couple of questions about the date and amount of each deposit to the lock box account and the date and amount of each disbursement from each account WRS set forth